REMARKS

This application has been reviewed in light of the Office Action dated February 11, 2009. Claims 94-99, 101-114, 116-129, 131-144 are presented for examination. Claims 100, 115, and 130 have been canceled, without prejudice or disclaimer of subject matter. Claims 94, 95, 109, 110, 124, and 125 have been amended to define more clearly what Applicants regard as the invention. Claims 139-144 have been added. Claims 94, 109, and 124 are in independent form. Favorable reconsideration is requested.

With respect to the Information Disclosure Statement (IDS) filed January 16, 2009, Applicants believe that the references cited in the Office Actions from the related applications were included in the form SB-08 or were previously submitted, so all of these references are believed to be of record. Nevertheless, for the Examiner's convenience, Applicants will submit shortly an new IDS listing all of the Office Actions from the related applications, all of the associated PTO-892 forms, and all of the references cited in those Office Actions, regardless of whether they have been cited before in this application. Applicants therefore respectfully request that the Examiner consider the new IDS and provide an initialed copy of the associated SB-08 forms.

It is believed that the objection to the Specification has been obviated by the amendment thereto. Withdrawal of the objection is respectfully requested.

Claims 94-99, 101, 103-105, 109-114, 116, 118, 119, 120, 124-129, 131, and 133-137 were rejected under 35 U.S.C. § 103(a) as obvious over U.S. Patent No. 6,460,034 ("Wical") in view of U.S. Patent No. 5,819,273 ("Vora") and U.S. Patent No. 6,374,241 ("Lamburt"). Claims 94-100, 101, 103-105, 107, 109-116, 118-120, 122, 124-131, and 133-137 were rejected over Horowitz in view of Vora and Lamburt. Dependent claims were rejected over these references in combination with various other references, as laid out in the Office Action.

Amended Claim 94 recites, *inter alia*, producing a plurality of refinement options <u>and a plurality of ancestors</u> by, in each of a plurality of servers, processing the expression of attribute-value pairs to produce at least one refinement option <u>and at least one ancestor</u>.

Claim 94 further recites:

(1) determining a set of ancestors for each of the plurality of refinement options, <u>from the plurality of ancestors produced in the plurality of servers</u>, to form sets of ancestors;

12

(2) computing an intersection of all of the sets of ancestors, and

(3) computing the combined refinement options based on terms in the intersection of all sets of ancestors.

Applicants would like to point out paragraph 129 of the published application with respect to these features:

[0129] There are at least two ways to compute the LCA of the terms. . . . A second approach is to include the ancestors when returning the terms that are refinements. This approach saves memory at the expense of increasing the size of the data being transferred. The latter overhead is reasonable, since, in practice, a term typically has very few ancestors.

In embodiments of the claimed invention, one server may contain, for example, only French wines, while another server may contain only Italian wines. In such a case, the French wine server would return ancestors such as "Region: Burgundy," while the Italian wine server would return ancestors such as "Region: Tuscany," and both servers would return the ancestor "Region: Europe." Thus, ancestors can be gathered from the various servers instead of being retrieved from a centralized knowledge base. It is worth noting that the gathered ancestors can be cached for use in future searches, as claimed in certain dependent claims, so it is not necessary to gather ancestors from the servers for each and every search.

The Office Action cites Wical as teaching computation of a least common ancestor and cites Horowitz as teaching combining parent and grandparent topics into "supertopics." Wical and Horowitz both rely on a centralized knowledge base. These references, either alone or in combination, do not teach or suggest producing ancestors in a plurality of servers and computing an intersection of these ancestors to end up with refinement options, in the specific manner recited in Claim 94.

Accordingly, Claim 94 is believed to be patentable over the cited references, no matter how they may be combined. In addition, independent Claims 109 and 124 recite features similar to those discussed above with respect to Claim 94 and therefore are also believed to be patentable over the cited references.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons.

13

Application No. 09/961,131   Docket No.: 0109878.00124US1
Amendment dated May 11, 2009
Response to Office Action of February 11, 2009

Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration or reconsideration, as the case may be, of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

If any fee is due, please charge our Deposit Account No. 08-0219, under Order No. 0109878.00124US1 from which the undersigned is authorized to draw.

Respectfully submitted,

Dated: May 11, 2009

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14